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Hearing Liaison
Public Health Hearing Office
Department of Public Health
PO Box 340308, MS #13PHO
410 Capital Avenue
Hartford, CT 06134-0308

Re: Docket number 14-12-21
Abandonment proceedings – Rainbow Springs, Middlefield, CT

Dear Hearing Liaison:

REJA Acquisition Corp., the applicant, does hereby move the departments to extend the time by which it must file late-file exhibits from November 23, 2015 up to and including Friday December 4, 2015.

The movant needs the added time to obtain records and other information in order to complete the late-filed exhibits. In particular, but not alone, the applicant needs more time to secure the data needed to meet the requirements of late-filed exhibit #2 & #3 – more specific data and information on fees and expenses and how such were paid going back to 2009 up through 9/1/15.

Notwithstanding this request for more time, the applicant provides preliminary compliance with its late-filed requests, to wit:

- Late File #1 & Late File #4:

A copy of the court decision in *Guida v. Crocker*, CV-97-0083602-S (Hodgson, J.) is attached.

At the request of Attorney Fred Klein this late-file exhibit was to include all pleadings in said docketed matter – subsequent to the hearing it was discovered that counsel's file in the matter has been purged and therefore copies of the pleadings are not readily obtainable. The court has archived its file. Applicant asks to be relieved of any obligation of chasing down copies of all the pleadings extant in the docketed matter, which documents would not provide any useful information given the content of the court's memorandum.

The applicant recalls that there was a subsequent court case involving many of the same parties brought in Rockville Superior Court, in which docket the issues of the case, which are recalled to have included those surrounding the water rates at Rainbow, were mediated by Judge Teller. Unfortunately, the court and counsel have expunged files.

- Late Files #2 & #3:

To be provided on extension given.

- Late File # 5:

There does not exist an actual distribution system map.

- Late File #6:

There is no record of the date REJA mailed notice of public comment hearing. The notice was mailed in advance of the scheduled hearing, do not recall exact date posted.

- Late File #7:

The system serves: 19 Lakeview Place, 18 Lakeview Place, 20 Lakeview Place, 22 Lakeview Place, 17 Lakeview Place, 23 Lakeview Place, 16 Lakeview Place, and 24C Lakeview Place. On information and belief applicant believes that there are about 18 bedrooms in total, and using state data, estimates 25 total customers on the system. [Note that there are 7 billing accounts – the Crocker's (20 Lakeview Place), though, are billed for a studio unit at 22 Lakeview Place].

WHEREFORE, applicant prays that its request for additional time is granted and that it be relieved of the obligation of producing the entire pleadings associated with Guida v. Crocker.

Very truly yours,

/s/

James Colin Mulholland, Esq.